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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAMUEL TAYLOR DERENCE,

Defendants.

Case No. CR 18-00430-RS

STIPULATION AND ~~[PROPOSED]~~
ORDER TO CONTINUE

The above-captioned matter is currently set for an initial status conference on December 4, 2018. Mr. Derence is presently participating in residential dual diagnosis treatment in Southern California. His treatment provider has very strict rules and has advocated strongly to have Mr. Derence remain in the program, without travel for court, until he completes the program in mid-January. Moreover, counsel for Mr. Derence is still completing necessary investigation and settlement negotiations are ongoing. The parties, therefore, jointly request that the matter be continued to January 22, 2019, at 2:30 p.m. for status conference.

The parties stipulate there is good cause – taking into account the public interest in the prompt disposition of this case – to exclude the time from December 4, 2018 to January 22, 2019 from computation under the Speedy Trial Act, and that failing to exclude that time would unreasonably deny

1 the defendant and his counsel the reasonable time necessary for effective preparation of counsel taking
2 into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv). The parties further
3 agree that the ends of justice would be served by excluding the time from December 4, 2018 to January
4 22, 2019 from computation under the Speedy Trial Act and that the need for the exclusion outweighs the
5 best interests of the public and the defendant in a speedy trial.

6 SO STIPULATED.

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8 Dated: November 26, 2018

/s/

MICHAEL RODRIGUEZ
Assistant U.S. Attorney

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10 Dated: November 26, 2018

/s/

GABRIELA BISCHOF
Attorney for Defendant Derence

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13 IT IS SO ORDERED.

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15 Date: 11/26/18



RICHARD SEEBORG
United States District Judge